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BARCLAYS PLC and NIGEL HIGGINS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

STEPHEN MERRITT, Individually and
on Behalf of All Others Similarly
Situating,

Plaintiff,

v.

BARCLAYS PLC, JAMES E STALEY,
and NIGEL HIGGINS,

Defendants.

CASE NO.: 2:23-cv-09217-MEMF-KS

**JOINT STIPULATION AND
[PROPOSED] ORDER
EXTENDING TIME TO RESPOND
TO AMENDED COMPLAINT**

Judge: Hon. Maame Ewusi-Mensah
Frimpong
Ctm: 8B
Complaint Filed: November 1, 2023

1 Lead Plaintiff Teamsters Local 237 Additional Security Benefit Fund and
2 Teamsters Local 237 Supplemental Fund for Housing Authority Employees (“Lead
3 Plaintiff”) and defendants Barclays PLC, James E. Staley, and Nigel Higgins
4 (collectively, “Defendants,” and together with Lead Plaintiff, the “Parties”), through
5 the undersigned counsel, hereby agree and stipulate to the following matters:

6 **WHEREAS**, on November 1, 2023, Stephen Merritt filed a complaint in the
7 above-captioned case (the “Complaint”) asserting claims under Sections 10(b) and
8 20(a) of the Securities Exchange Act of 1934 (15 U.S.C. §§78j(b) and 78t(a)) and
9 Rule 10b-5 promulgated thereunder by the U.S. Securities and Exchange Commission
10 (17 C.F.R. §240.10b-5) (ECF No. 1);

11 **WHEREAS**, on June 11, 2024, the Court appointed Lead Plaintiff and
12 approved Lead Plaintiff’s selection of Robbins Geller Rudman & Dowd LLP as Lead
13 Counsel (ECF No. 31);

14 **WHEREAS**, on July 15, 2024, the Court granted the Parties’ Joint Stipulation
15 Regarding Scheduling for the Amended Complaint and Extending Time to Respond
16 Thereto (ECF. No. 51) with the following schedule: Lead Plaintiff to file an amended
17 complaint by August 12, 2024; Defendants to answer, move or otherwise respond to
18 the amended complaint on or before October 11, 2024; if Defendants move to dismiss,
19 Lead Plaintiff to file any opposition to the motion by December 10, 2024; and
20 Defendants to file any reply in support of any motion to dismiss by January 23, 2025
21 (ECF No. 34);

22 **WHEREAS**, on August 12, 2024, Lead Plaintiff filed the Amended Class
23 Action Complaint for Violations of the Securities Laws of the United States and the
24 United Kingdom (the “Amended Complaint”) (ECF No. 52), which continues to assert
25 claims under the Exchange Act against previously named defendants Barclays PLC
26 and Staley but adds new defendant Higgins as well as a claim under Section 90A of
27 the United Kingdom’s Financial Services and Markets Act (“FSMA”) against
28 Barclays PLC;

1 **WHEREAS**, Defendants have confirmed that they intend to move to dismiss
2 the Amended Complaint;

3 **WHEREAS**, pursuant to Local Rule 7-3, the Parties have conferred and
4 reached agreement on a modest extension for Defendants to file such motion (which
5 would, among other things, address the newly added FSMA claim and reflect the
6 position of the newly named defendant) and a corresponding extension for Lead
7 Plaintiff to file its opposition;

8 **WHEREAS**, the schedule proposed herein is made in the interest of fairness
9 and efficiency in this action, is not intended to delay the proceedings and will not
10 prejudice any party;

11 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by
12 and between Lead Plaintiff and Defendants, that, subject to the Court's approval:

13 1. Defendants will move to dismiss the Amended Complaint on or before
14 October 30, 2024;

15 2. Lead Plaintiff will file its opposition to the motion by January 17, 2025;

16 3. Defendants will file any reply in support of the motion to dismiss by
17 February 28, 2025.

18 4. Nothing herein shall be deemed to constitute a waiver of any rights,
19 objections or defenses (including, but not limited to, jurisdictional defenses) that any
20 party may have with respect to this action or to the claims asserted in any complaint,
21 and is without prejudice to any other or further application by a party to this Court or
22 any other court.

1 DATED: September 20, 2024

2 Respectfully submitted,

3 **ROBBINS GELLER RUDMAN & DOWD LLP**

4 By: /s/ Ashley M. Price
5 Ashley M. Price

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I, Peter B. Morrison, attest that all other signatories listed,
and on whose behalf this filing is also submitted, concur in
the filing's content and have authorized the filing.

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